

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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AURELIUS CAPITAL MASTER, LTD.;	:	
ACP MASTER, LTD.; AURELIUS	:	
OPPORTUNITIES FUND, LLC; 683	:	
CAPITAL PARTNERS, LP; ADONA LLC;	:	
EGOZ I LLC; EGOZ II LLC; MASTERGEN,	:	
LLC; ERYTHRINA, LLC; AP 2016 1, LLC;	:	
AP 2014 3A, LLC; AP 2014 2, LLC; WASO	:	
HOLDING CORPORATION; TWO SEAS	:	
GLOBAL (MASTER) FUND LP; VIRTUAL	:	
EMERALD INTERNATIONAL LTD.; and	:	Case No.: 1:23-CV-10838 (LAP)
THE BANK OF NEW YORK MELLON,	:	
solely in its capacity as Trustee,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
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**STIPULATION AND ORDER**

Defendant The Republic of Argentina (the “Republic”), through its counsel, and Plaintiffs Aurelius Capital Master, Ltd., ACP Master, Ltd., Aurelius Opportunities Fund, LLC, 683 Capital Partners, LP, Adona LLC, Egoz I LLC, Egoz II LLC, Mastergen, LLC, Erythrina, LLC, AP 2016 1, LLC, AP 2014 3A, LLC, AP 2014 2, LLC, WASO Holding Corporation, Two Seas Global (Master) Fund LP, Virtual Emerald International Ltd., and the Bank of New York Mellon (together, “Plaintiffs”), through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, between January 2019 and December 2020, certain plaintiffs, including twelve of the Plaintiffs in this action, filed suit against the Republic alleging that payment

was due under U.S. dollar-denominated GDP-linked securities (the “Securities”) for reference year 2013 (the “RY 2013 Actions”)<sup>1</sup>;

WHEREAS, on October 2, 2023, briefing was fully submitted in the RY 2013 Actions on cross-motions for summary judgment;

WHEREAS, on December 13, 2023, Plaintiffs filed their complaint in this action (ECF No. 1, the “Complaint”), alleging that payment was due under the Securities for reference years following 2013; and

WHEREAS, the Republic’s response to the Complaint is currently due on February 12, 2024 (ECF No. 9).

IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN the undersigned counsel as follows:

1. The Republic’s time to answer, move to dismiss, or otherwise respond to the Complaint is extended to 60 days after the Court rules on the cross-motions for summary judgment in the RY 2013 Actions.

2. The Republic does not waive and expressly retains all defenses and objections to the Complaint, except for defenses and objections based on a defect in service of process in this action. The defenses and objections that the Republic retains include but are not limited to defenses and objections related to (i) any applicable statutes of limitation or prescription periods and (ii) any other challenge to the legal sufficiency of Plaintiffs’ claims.

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<sup>1</sup> There are six RY 2013 Actions in total: *Aurelius Capital Master, Ltd. v. The Republic of Argentina*, 19-cv-0351-LAP; *ACP Master, Ltd. v. The Republic of Argentina*, 19-cv-10109-LAP; *Novoriver S.A. v. The Argentine Republic*, 19-cv-09786-LAP; *683 Capital Partners, LP v. The Republic of Argentina*, 19-cv-10131-LAP; *Adona LLC, et. al. v. The Republic of Argentina*, 19-cv-11338; and *Ape Group SPA, et. al. v. The Republic of Argentina*, 20-cv-10409.

Dated: January 23, 2024

/s/ Robert J. Giuffra, Jr.

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/s/ Edward A. Friedman

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*Counsel for Plaintiffs Aurelius Capital Master, Ltd. and ACP Master, Ltd., Aurelius Opportunity Fund LLC, and the Bank of New York Mellon*

/s/ Matthew M. Riccardi

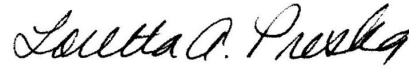
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*Counsel for Plaintiff 683 Capital Partners, LP*

IT IS SO ORDERED, this 24th day of January, 2024:

A handwritten signature in black ink, reading "Loretta A. Preska". The signature is written in a cursive, flowing style.

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Hon. Loretta A. Preska  
United States District Judge